

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK**

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CASE NO. 15-564 (RJD)

UNITED STATES OF AMERICA,

Plaintiff,

v.

FABIO TORDIN,

Defendant.

-----X

**NOTICE OF MOTION TO
ADMIT JUAN M.
VARGAS PRO HAC VICE**

PLEASE TAKE NOTICE that upon the annexed affidavit of Juan M. Vargas in support of this motion and the Certificate of Good Standing annexed thereto we will move this court pursuant to Rule 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York for an Order allowing the admission of Juan Vargas, of counsel to the firm of Diaz, Reus & Targ, LLP, and a member in good standing of the Bar of the State of Florida, as attorney pro hac vice to argue or try this case in whole or in part as counsel for defendant Fabio Tordin. There are no pending disciplinary proceedings against me in any State or Federal court.

DATED: November 9, 2015

Respectfully submitted,

s/Juan M. Vargas

Juan M. Vargas

Diaz Reus & Targ, LLP

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100 Southeast Second Street

Miami, Florida 33131

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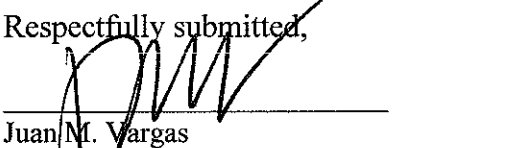
**AFFIDAVIT OF
JUAN M. VARGAS
IN SUPPORT OF
MOTION TO ADMIT
COUNSEL PRO HAC
VICE**

I, Juan M. Vargas, being duly sworn, hereby state and declare as follows:

1. I am of counsel with the law firm of Diaz, Reus & Targ, LLP.
2. I submit this affidavit in support of my motion for admission to practice *pro hac vice* in the above captioned matter.
3. As shown in the Certificate of Good Standing annexed hereto I am a member in good standing of the Bar of the State of Florida.
4. There are no pending disciplinary proceedings against me in any State or Federal Court.
5. Wherefore I respectfully submit that I be permitted to appear as counsel and advocate *pro hac vice* in this one case for defendant Fabio Tordin.

DATED: November 6, 2015

Respectfully submitted,



Juan M. Vargas
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100 Southeast Second Street
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Tel: 305-375-9220
Fax: 305-375-8050
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SWORN TO and SUBSCRIBED before me this 6th day of NOVEMBER 2015.

Louder Valdes

Print Name
NOTARY



My commission expires:



The Florida Bar

JOHN F. HARKNESS, JR.
EXECUTIVE DIRECTOR

651 EAST JEFFERSON STREET
TALLAHASSEE, FLORIDA 32399-2300

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State of Florida)

County of Leon)

In Re: 578673
Juan M. Vargas
100 S.E. 2nd St., Ste. 3400
Miami, FL

I HEREBY CERTIFY that I am the duly appointed custodian of membership records of The Florida Bar.

I FURTHER CERTIFY that the records in the office of the Clerk of the Supreme Court of Florida indicate that said attorney was admitted to practice law in the State of Florida on July 17, 1986.

I FURTHER CERTIFY that the records in the office of The Florida Bar indicate that the above attorney is an active member of The Florida Bar in good standing.

Dated this 30th day of October, 2015.

Pam Gerard, Manager
Membership Records Dept.
The Florida Bar

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